

Exhibit A

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FEDERAL TRADE COMMISSION,)	
)	
Plaintiff,)	
)	Civ. No. 04-CV-11136-GAO
v.)	
)	
DIRECT MARKETING CONCEPTS, INC., et al.,)	
)	
Defendants.)	
)	

**PLAINTIFF THE FEDERAL TRADE COMMISSION'S SECOND
SET OF INTERROGATORIES TO DEFENDANTS ITV DIRECT, INC. AND
DIRECT MARKETING CONCEPTS, INC., PURSUANT TO FED. R. CIV. P. 33**

Plaintiff Federal Trade Commission ("FTC" or "Commission") propounds the following interrogatories upon defendants ITV Direct, Inc. and Direct Marketing Concepts, Inc., and requests that they be answered separately, fully and under oath within thirty (30) days of service pursuant to Rule 33 of the Federal Rules of Civil Procedure.

DEFINITIONS

1. "ITV Direct" shall mean ITV Direct, Inc., its wholly or partially-owned subsidiaries, parent companies, unincorporated divisions, joint ventures, partnerships, operations under assumed names, predecessors, and affiliates, and all directors, officers, partners, employees, agents, attorneys, consultants, franchisees, advertising agencies, fulfillment houses, independent distributors, and any other person or entity, working for or on behalf of any of the foregoing.

2. "DMC" shall mean Direct Marketing Concepts, Inc., its wholly or partially-owned subsidiaries, parent companies, unincorporated divisions, joint ventures, partnerships, operations under assumed names, predecessors, and affiliates, and all directors, officers, partners,

INTERROGATORY NO. 7:

For the time periods set forth in response to Interrogatory No. 1 and No. 2, set forth how many times the Coral Calcium infomercial ran in the United States and the amount of money that was spent disseminating the Coral Calcium Daily infomercial in the United States. If you are not able to provide a response for the entire period(s) set forth in response to Interrogatories No. 1 and No. 2, please provide this information for all periods of time for which a response can be provided and indicate the specific periods of time to which the response is applicable.

ANSWER:

INTERROGATORY NO. 8:

Set forth what steps, if any, DMC or ITV Direct took prior to the dissemination of the Coral Calcium Daily infomercial to evaluate the accuracy and/or validity of the claims made in the Coral Calcium Daily infomercial, including the names of any scientific experts whom they may have consulted.

ANSWER:

INTERROGATORY NO. 9:

Identify any scientific evidence that a) the human body absorbs 100% of the calcium contained in Coral Calcium Daily; or b) the coral calcium ingredient in Coral Calcium Daily is a

treatment or cure for cancer, Parkinson's disease, heart disease and autoimmune diseases, including multiple sclerosis and lupus.

ANSWER:

INTERROGATORY NO. 10:

For the time period(s) set forth in response to Interrogatory No. 1 and No. 2, identify all of the owners of DMC and ITV Direct, and provide their respective titles and ownership shares at each point during that time period.

ANSWER:

INTERROGATORY NO. 11:

For each of the years 2001, 2002, 2003, and 2004, identify the recipients of all subchapter S distributions made by ITV Direct and DMC, and the amount of the distributions made to each such recipient.

ANSWER:



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ATTORNEYS FOR PLAINTIFF
Dated May 19, 2005

CERTIFICATE OF SERVICE

My name is Daniel Kaufman and I am an attorney with the Federal Trade Commission. On May 19, 2005, copies of Plaintiff the Federal Trade Commission's Second Set of Interrogatories to Defendants ITV Direct, Inc. and Direct Marketing Concepts, Inc., Pursuant to Fed. R. Civ. P. 33 were served via FEDEX as follows:

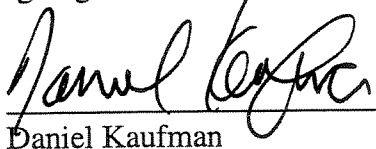
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I declare under penalty of perjury that the foregoing is true and correct. Executed this May 19, 2005 at Washington, D.C.


Daniel Kaufman